

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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| -----X | : | |
| UNITED STATES OF AMERICA, | : | |
| | : | |
| Plaintiff, | : | |
| | : | |
| -against- | : | Criminal No. 1:19-cr-10080-NMG |
| | : | |
| DAVID SIDOO, ET AL, | : | |
| | : | |
| Defendants. | : | |
| | : | |
| -----X | : | |

**NONPARTY UNIVERSITY OF SOUTHERN CALIFORNIA’S
ASSENTED-TO MOTION FOR LEAVE TO FILE MOTION TO QUASH AND
MEMORANDUM IN SUPPORT UNDER SEAL**

Nonparty University of Southern California (“USC”), by and through undersigned counsel, hereby respectfully moves this Honorable Court for leave to file under seal its Motion to Quash and Memorandum in Support of its Motion to Quash Defendant John Wilson’s Rule 17(c) subpoenas (“the Motion”). In support of this motion, USC states that it seeks to file its Motion under seal because it understands that the subpoenas were authorized by the Court pursuant to *ex parte* sealed filings by Defendant Wilson. In order to address the specific demands of the subpoenas that USC would like quashed in a manner consistent with this Court’s prior order sealing the subpoena, USC seeks permission to file its Motion under seal.

WHEREFORE, USC respectfully requests that this Court allow it leave to file its Motion under seal.

COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

Undersigned counsel conferred with counsel for Defendant Wilson who assents to USC filing its Motion under seal.

Respectfully submitted,

UNIVERSITY OF SOUTHERN CALIFORNIA,
By its attorneys,

/s/ Debra Wong Yang

Debra Wong Yang (Admitted *Pro Hac Vice*)
Douglas M. Fuchs (Admitted *Pro Hac Vice*)
GIBSON DUNN & CRUTCHER LLP
333 South Grand Avenue
Los Angeles, CA 90071-3197
(213)229-7000
dwongyang@gibsondunn.com
dfuchs@gibsondunn.com

/s/ Anthony E. Fuller

Anthony E. Fuller (BBO #633246)
William H. Kettlewell (BBO# 270320)
Elizabeth C. Pignatelli (BBO #677923)
HOGAN LOVELLS US LLP
125 High St., Suite 2010
Boston, MA 02110
(617) 371-1000
anthony.fuller@hoganlovells.com
bill.kettlewell@hoganlovells.com
elizabeth.pignatelli@hoganlovells.com

July 2, 2020

CERTIFICATE OF SERVICE

I, hereby certify that this document filed through ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent those indicated as nonregistered participants on July 2, 2020.

/s/ Anthony E. Fuller

Anthony E. Fuller